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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEVEN RAYMON WALLER,

Defendant.

CASE NO. 2:23-CR-00122-DAD

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: December 12, 2023
TIME: 9:30 a.m.
COURT: Hon. Dale A. Drozd

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on December 12, 2023.
2. By this stipulation, defendant now moves to continue the status conference until March 5, 2024, and to exclude time between December 12, 2023, and March 5, 2024, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes approximately 12,000 pages of discovery including surveillance videos. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
 - b) Counsel for defendant desires additional time to consult with her client, review

1 the current charges and discovery, to conduct investigation and research related to the charges,
2 and to discuss potential resolutions with her client.

3 c) Counsel for defendant believes that failure to grant the above-requested
4 continuance would deny him/her the reasonable time necessary for effective preparation, taking
5 into account the exercise of due diligence.

6 d) The government does not object to the continuance.

7 e) Based on the above-stated findings, the ends of justice served by continuing the
8 case as requested outweigh the interest of the public and the defendant in a trial within the
9 original date prescribed by the Speedy Trial Act.

10 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
11 et seq., within which trial must commence, the time period of December 12, 2023 to March 5,
12 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
13 T4] because it results from a continuance granted by the Court at defendant's request on the basis
14 of the Court's finding that the ends of justice served by taking such action outweigh the best
15 interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: December 5, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ NICHOLAS M. FOGG
NICHOLAS M. FOGG
Assistant United States Attorney

Dated: December 5, 2023

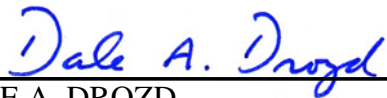
/s/ NOA OREN
NOA OREN
Counsel for Defendant
STEVEN RAYMON WALLER

ORDER

Pursuant to the stipulation of the parties and good cause appearing, the status conference previously scheduled for December 12, 2023 is continued to March 5, 2024, at 9:30 a.m. and time is excluded between December 12, 2023, and March 5, 2024, under Local Code T4.

IT IS SO ORDERED.

Dated: December 5, 2023



DALE A. DROZD
UNITED STATES DISTRICT JUDGE